

2021R00493/EAB/SD/jw

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Douglas E. Arpert
v.	:	Mag. No. 21-6030 (DEA)
DOMINIC RICCI,	:	ABANDONMENT AND WAIVER
Defendant.	:	OF RIGHTS TO CERTAIN
	:	SEIZED PROPERTY

WHEREAS, on or about June 7, 2022, defendant Dominic Ricci (the “defendant”) pleaded guilty pursuant to a plea agreement with the United States. In the plea agreement, the defendant agreed to forfeit and abandon to federal, state, and/or local law enforcement all of his right, title, and interest in the specific property listed in the attached Schedule B (collectively, the “Property”);

WHEREAS, based upon the plea agreement, the defendant waives, abandons, and surrenders all of his right, title, and interest in the Property; will not challenge in any way his waiver, abandonment, and surrender of the Property, including any and all procedural challenges such as the right to any further notice; and agrees and consents to the lawful disposition, including destruction, of the Property by federal, state, and/or local law enforcement; and

WHEREAS, the defendant further agrees that this Abandonment and Waiver of Rights is final and unappealable.

ORDERED this 27th day of October 2022.



HONORABLE DOUGLAS E. ARPERT
United States Magistrate Judge

The undersigned hereby consent to the form and entry of this Order:

PHILIP R. SELLINGER
United States Attorney

Eric A. Boden

By: ERIC A. BODEN
Assistant United States Attorney

Dated:

Adam Axel

ADAM AXEL, ESQ.
Attorney for Defendant Dominic Ricci

Dated: 10/27/2022

Adam Axel for Dominic Ricci

DOMINIC RICCI, Defendant

Dated: 10/27/2022

Schedule B

As part of his acceptance of responsibility, RICCI hereby waives, abandons, surrenders, and forfeits all of his right, title, and interest in the specific property as set forth below (the "Specific Property"):

- One Yuneec Typhoon H Drone (6 rotor), serial number YU1732043680BA01 CA011732043501, with one CG03+ camera, fishing line and iPhone charging cable attached to the Drone;
- One Yuneec Model ST16 controller, serial number CMIIT ID 2016AJ1824 with micro SD card inserted (not removed) and one battery inserted (not removed);
- One Yuneec brand battery charger, serial number SCB1748003401;
- One Yuneec brand lithium polymer battery, Model Power 4, serial number 809032017410376B;
- One Samsung black and silver Lithium-Ion battery, serial number AA2K418QS/2-B
- One Samsung black and silver Lithium-Ion battery, serial number AA1R420DS/2-B;
- One Samsung black and silver Lithium-Ion battery, serial number AA1R420ZS/2-B;
- One Samsung black and silver Lithium-Ion battery, serial number BD1M123FS/2-B;
- One Samsung black and silver Lithium-Ion battery, serial number BD1M125GS/2-B;
- One Samsung black and silver Lithium-Ion battery, serial number AA1R420PS/2-B;
- One Samsung black and silver Lithium-Ion battery, serial number AA2K608HS/2-B
- Two urs2Go Lithium-Ion batteries, model number ACE440
- 5 clear plastic bags sealed and marked, each containing a dried, brown leafy substance cut into strips, and believed to be smoking tobacco. Each bag additionally contains cigarette rolling papers;

- Three black bags;
- 5 Grey Samsung cellular phones with removeable back cover plates, each containing a black and silver Samsung Lithium-Ion battery and an AT&T SIM card;
- 7 Grey Samsung cellular phones bearing serial numbers: RF8M316FFXP, R28K62FEYKF, RF8M40P72MX, R28K50BFOWB, R28K82ZBBRY, RF8M316BWKN, and R28K50BF21D;
- 12 white micro USB cables for cellular phones;
- 12 white travel adapter charging blocks, each stamped "Samsung;"
- 24 AT&T SIM cards; and
- One black and silver carabiner with approximately 94 inches of attached black cord.